

## SUMMARY OF RECENT CITY OF SAN FRANCISCO NPDES PERMIT VIOLATIONS

### 1. SOUTHEAST - Current Permit # ORDER No. R2-2013-0029

NPDES No. CA0037664

A	B	C	D
Date of Violation	Description of Violation	Permit Term Violated	Date and Type of Document / Exhibit #
2/8/14	Discharging un-dechlorinated treated water from southeast WPCP  (Violation #1)	Section 3. a & c	2/13/14 5D (Ex. 1) 4/9/14 5DSup (Ex. 2) 4/15/14 CCSF (Ex. 2A) 6/10/14 VN (Ex. 3) 6/30/14 CCSF (Ex. 4) 10/22/14 CCSF (Ex. 5)  1 - Folder 001
2/8/14	Discharging untreated wastewater  (Violation #2)	Section 3. a & c	2/13/14 5D (Ex. 1) 4/9/14 5DSup (Ex. 2) 6/10/14 VN (Ex. 3 above) 6/30/14 CCSF (Ex. 4 above) 10/22/14 CCSF (Ex. 5)  1 - Folder 001
2/28/14	Discharge of un-dechlorinated treated wastewater at discharge point No. 003 through No. 006	Section 3. a & c	3/5/14 5D (Ex. 6) 4/9/14 5DSup (Ex. 7) 6/10/14 VN (Ex. 3 above) 6/30/14 CCSF (Ex. 4 above)  2 - Folder 002
3/10/14	Discharge primary treated wastewater at discharge point No.001	Section 3. a & c	3/14/14 5D (Ex. 8) 4/09/14 5D (Ex. 8A) 6/10/14 VN (Ex. 3 above) 6/30/14 CCSF (Ex. 4 above)  3 - Folder 003
4/28/14	Unauthorized discharge due to grease blocking manhole water way		5/06/15 5D (Ex. 9) 5/06/15 CCSF (Ex. 10)  4 - Folder 004

## EXHIBIT M

5/14/14	Discharge secondary treated wastewater during dry weather to Islais creek discharge point.	Section 3. a & d	5/19/14 5D (Ex. 11) 5/15/14 CCSF (Ex. 11A) 6/10/14 VN (Ex. 3 above) 6/30/14 CCSF (Ex. 4 above)  5 - Folder 005
7/19/14	Unauthorized discharge with a positive chlorine residual	Section IV. A. 1. Table 6	7/24/14 5D (Ex. 12)  6 - Folder 027
10/17/14	Coliform bacterial counts not calculated as required. 1 permit violation since the last inspection. Not sufficiently dechlorinating discharge water		10/17/14 CEI (Ex. 13)  7 - Folder 006

**2. SOUTHEAST** - Previous Permit # ORDER No. R2-2002-0073 and

ORDER No. R2-2008-0007

NPDES No. CA0037664

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Date of Violation	Description of Violation	Permit Term Violated	Date and Type of Document / Exhibit #
8/10/04	Unauthorized dry weather discharge due to power outage, insecure back-up power source, refrigeration of effluent not right temp	ORDER NO. R2-2002-0073 NPDES PERMIT NO. CA0037664 Condition 10.e	9/14/04 CEI (Ex. 14) 1/14/05 CCSF (Ex. 15)  1 - Folder 009
12/6/14 and 12/7/14	Numerous deficiencies in CCSF's POTW pre-treatment program	Various Pretreatment Compliance Inspection Summary Report, see Sections 5.1, 5.2, 5.3, 6, 7, 1, 7.3, 7.4, 7.5, 8, 9, pp.	2/16/05 PCI (Ex. 16) 3/04/05 CCSF (Ex. 17)  2 - Folder 033

11/17/05	CCSF facility using incorrect BOD (biochemical oxygen demand) values in their reporting. Three prohibited dry weather discharges to Islais creek noted since last inspection.		1/30/06 CEI (Ex. 18) 3/14/06 CCSF (Ex. 19)  3 - Folder 034
8/09/07	CCSF was not regulating SIU's and inspecting private companies before reissuing them a permit, not citing SIU's if they did violate their permit, many instances of non compliance	40 CFR 403.8(f)(1)(iii)(B)(4) 40 CFR 403.8(f)(2)(v) 40 CFR 403.8(f)(2)(iv)	8/09/07 PCA (Ex. 20) 9/20/07 CCSF (Ex. 21)  4 - Folder 014
5/8/08	Effluent exceedance of chlorine residual in the effluent reported since the last inspection.	Part B of Order No. R2-2002-0073	7/29/08 CEI (Ex. 22)  5 - Folder 035
6/26/2008	PCI report conducted indicates in the cover letter that the CCSF was not compliant. Water board specifically asks CCSF for a response regarding how they "plan to achieve compliance".		6/26/08 PCI cover (Ex. 23) 7/24/08 CCSF (Ex. 24)  6 - Folder 015
7/11/08	Discharge spill into Islais Creek as a result of PG&E power outage		7/14/08 5D (Ex. 25) 7/14/08 CCSF (Ex. 26) 7/14/08 CCSF H (Ex. 27)  7 - Folder 013
9/11/2008	Fecal coliform concentration exceedance caused five permit violations		1/28/09 AR (Ex. 28)  8 - Folder 037

12/16/08	Bacterial concentrations in the effluent was higher than the permit allowed.	Order No. R2-2008-0007, Provision IV.B.1.c,	11/5/2009 IP (Ex. 29) 1/28/09 AR (Ex. 28 above)  9 - Folder 012
1/15/09	The southeast WPCP was not adequately recording and reporting their data to the water board. The plant also discharged effluent that exceeded the permits concentration of fecal coliform bacteria. Lab work was not performed adequately with permit standards.	Order No. R2-2008-0007. Section 3a Section 3c. Section 2.d. Section 4g. Section 5a. Section 7.i. 40 CFR Part 136.	2/23/09 IP (Ex. 30) 4/8/09 CCSF (Ex. 31) 4/9/09 CCSF (Ex. 32)  10 - Folder 011
2/02/09	PCI cover letter from 2009 indicates CCSF no compliance due to inadequately regulating SIU's – 18 out of 30 SIU's were not inspected at all by CCSF.		7/29/09 PCI cover (Ex. 33)  11 - Folder 016
2/23/09	High copper concentrations in the influent to southeast WPCP	Section 8 Special Provisions Copper Action Plan	6/23/09 CCSF (Ex. 34)  12 - Folder 008
9/21/09	Enterococcus bacterial concentration exceedance in the effluent at discharge point 002.	Order No. R2-2008-0007, Provision IV.B.1.c,	11/05/09 CEI (Ex. 35)  13 - Folder 036
2/26/10	SIU's significant noncompliance on page 46 of 2009 AR. Summary of report also indicates 5 notices of violations against SUI's and 1 SUI with published noncompliance		3/26/10 AR (Ex. 36)  14 - Folder 038

10/13/10	CCSF not correctly reporting all overflow events or reporting them at all, not maintaining overflow structures as required by their permit and not keeping-up with general plant maintenance, not removing solids and floating materials prior to discharge	Order No. R2-2008-0007, Attachment D, Section D  Order No. R2-2008-0007, Section V-Receiving Water Limitations, Item 7, (I)  No. R2-2008-0007, V. Receiving Water	10/13/10 CEI (Ex. 37) 6/6/11 CCSF (Ex. 38) 12/20/11 CCSF (Ex. 39)  15 - Folder 017
12/14/11	The effluent from southeast WPCP did not pass the fish/organism test of 90 percent or more survival	No. R2-2008-0007, Section IV.A.1.f	2/8/12 CEI (Ex. 40)  16 - Folder 010
11/16/12	Enterococcus violation		5/30/14 CEI (Ex. 41)  17 - Folder 031
12/08 thru 12/12	Ten counts of Enterococcus bacterial concentration exceedances in the effluent at southeast WPCP between 2008-2012	Sections 13385(h) and 13385(i)	1/25/10 AR (Ex. 42) 1/31/11 AR (Ex. 43) 6/18/13 CCSF (Ex. 44) 7/23/13VN (Ex. 45) 7/23/13 W (Ex. 46)  18 - Folder 007

**3. OCEANSIDE -** Current Permit # ORDER No. R2-2009-0062

NPDES No. CA0037681

<b>Date of Violation</b>	<b>Description of Violation</b>	<b>Permit Term Violated</b>	<b>Date and Type of Document / Exhibit #</b>
7/21/14	Unauthorized discharge and operator error on 2 hour reporting requirement		7/30/14 5D (Ex. 47) 9/23/14 PP (Ex. 48)  1 - Folder 024
8/27/14	Unauthorized discharge		9/4/14 5D (Ex. 49) 9/23/14 PP (Ex. 50)  2- Folder 025
12/11/14	Unauthorized discharge		1/26/13 CCSF (Ex. 51) 12/11/14 2HR (Ex. 52) 12/18/14 5D (Ex. 53) 1/7/15 CCSF (Ex. 54) 1/13/15 CCSF (Ex. 55) 1/23/15 5D Sup (Ex. 56) 1/26/15 CCSF (Ex. 57) 1/28/15 CCSF (Ex. 58) 2/24/15 PP (Ex. 59) 3/30/15 CCSF (Ex. 60) 4/27/15 CCSF (Ex. 61) PP (Ex. 62)  3 - Folder 026
12/11/14	Manhole covers found displaced – possible resulting unauthorized discharge to Lake Merced		12/15/14 5D (Ex. 63) 12/23/ 14 CCSF (Ex. 64)  4 - Folder 030
6/10/15	Discharge of untreated sewage at Seacliff #1		6/11/15 CCSF (Ex. 65) 6/15/15 5D (Ex. 66)  5 - Folder 029

**4. OCEANSIDE -** Previous Permit # ORDER No. R2-2003-0073

NPDES No. CA 0037681

<b>Date of Violation</b>	<b>Description of Violation</b>	<b>Permit Term Violated</b>	<b>Date and Type of Document / Exhibit #</b>
12/06/04	Many deficiencies relate to CCSF regulation of SIU's and inadequate reporting and self-monitoring.	40 CFR 403.18  40 CFR 403.8(0(2))  40 CFR 403.8(0(1)(iii))  40 CFR 403.S(0(2)(v))  40 CFR 403.3(0(5))	2/16/05 PCI (Ex. 67) 3/4/15 CCSF (Ex. 68)   1 - Folder 019
11/13/06	Massive volume of untreated sewage and untreated storm water spilled onto the great highway and ocean beach over two days.	Section 13385(a) (2), Section 13385(a) (4) and Section 13323.	11/16/06 Email (Ex. 69) 11/20/06 CCSF (Ex. 70) 11/22/06 24H (Ex. 71) 12/22/06 CCSF (Ex. 72) 3/26/07 CCSF (Ex. 73) 3/26/07 VN (Ex. 74) 4/27/07 CCSF (Ex. 75) 6/20/07 W (Ex. 76) 7/11/07 Fine (Ex. 77) 3/24/11 CCSF (Ex. 78)  2 - Folder 018
2/5/08	2008 PCI cover letter indicates CCSF noncompliance.		2/26/08 PCI (Ex. 79)  3 - Folder 022

3/04/08	The CCSF was noncompliant due to inadequate reporting of CSO control efficacy study and overflow impacts data. Records of monitoring information deficient in multiple fields. Laboratory procedures to record maximum holding times for samples deficient and therefore noncompliant.	No. R2-2003-0073, Section F.4.i., 40 CFR §122.41(j)(3), 40 CFR §136.3, Table II,	3/04/08 CEI (Ex. 80)  4 - Folder 021
1/14/09	Final report of the overflow impacts and CSO control efficacy study were not submitted to water board. Regulatory manager was absent on day of inspection, signature required. Influent and effluent data that was submitted was wrong.	Order No. R2-2003-0073, Section F.4.i.(C),  Order No. R2-2003-0073, Provision F.13,  40CFR Part 122.41(j)(1)	2/23/09 IP (Ex. 81) 4/09/09 CCSF (Ex. 82)  5 - Folder 020
2/02/09	Annual Pretreatment report on page 39. Lists all instances of non compliance by SIU's in the 2008 year		2/02/09 APR (Ex. 83)  6 - Folder 038
3/16/12	Discharge spill during rainstorm due to PG&E power outage		3/23/12 CCSF (Ex. 84) 3/30/15 CCSF (Ex. 85)  7 - Folder 026
4/12/12	Storm water over flow		5/21/12 CCSF (Ex. 86) 5/21/12 CCSF (Ex. 87)  8 - Folder 028
11/21/12	Discharge due to manhole covering dislodging		11/26/12 CCSF (Ex. 88)  9 - Folder 023



Legend:

Abbreviations	Description
CEI	Compliant Evaluation Inspection Report
PCI	Pretreatment Inspection Report
IP	Inspection Report
VN	Violation Notices
AR	Annual Report
APR	Annual Pretreatment Report
5D	5-Day Incident Reports
5DSup	5-Day Supplemental Report
CCSF	City Response Correspondence
24H	24-Hour Reports
PP	Power Point
SIU's	Significant Industrial Users
W	Waiver of Right to a Hearing
CSO	Combined Sewer Overflows